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July 24, 2020

Hon. Analisa Torres, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 15D
New York, NY 10007

By Electronic Filing.

Re: Motion to Accept Documents Filed Out of Time
Gallagher et al. v. New York State Board of Elections et al., 20-cv-5504

Dear Judge Torres,

As the Court is aware, my firm represents the Plaintiffs in the matter named above. I write to formally ask the Court to accept the filing I submitted after midnight last night. *See* Fed. R. Civ. P. 7(b)(1) ("A request for a court order must be made by motion.").

As I noted in my email to chambers at 11:44 p.m. (attaching the final versions of our papers) last night, the electronic filing system was having significant issues such that, when pages loaded at all, they were taking 5-6 minutes to load each (if I recall correctly, there are about seven pages one must click through to file, and I used the Second Circuit's pdf-checker utility to ensure all of my documents were properly formatted). As I noted in the email, at that time, I'd already spent about 35 minutes attempting to file. I took a pair of screenshots of what I was seeing, and I have appended them to this letter.

From the time of my email, I tried every workaround I could think of and eventually had the system accept my filing at 12:44 a.m. (meaning I spent the better part of two hours trying to file). I ask, under these circumstances, that the Court grant us either an "extension" or treat the papers as filed as of the time I emailed them to Chambers.

Respectfully submitted,


/s/ J. Remy Green

J. Remy Green
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GRANTED.

SO ORDERED.

Dated: July 24, 2020
New York, New York



ANALISA TORRES
United States District Judge